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28 November 2018

VIA ELECTRONIC FILING

The Honorable Madeline Cox Arleo
United States District Court
50 Walnut Street
Newark, New Jersey 07101

Re: Alpha Cepheus –v- Chu et al.

United State District Court Docket Number: 18-cv-114322

(*Plaintiffs Motion for Reconsideration of the Denial of Injunctive Relief – Returnable
17 December 2018*)

Dear Judge Arleo:

As the Honorable Court is aware, this law firm represents defendants James Stepien (hereinafter “Stepien”) and Victor Cardona (hereinafter “Cardona”) in the aforesaid litigation.

On or about 19 October 2018, the plaintiffs filed a motion for a preliminary injunction and an Order to Show Cause. That motion was ultimately and entirely denied by the Honorable Court. On 13 November 2018, the plaintiffs filed a motion to reconsider the aforesaid denial of the Honorable Court. Thereafter, or about 21 November 2018, learned counsels for defendant Chin Chu (hereinafter “Chu”) and Douglas Newton (hereinafter “Newton”) filed an Opposition to the aforesaid plaintiffs’ motion for reconsideration.

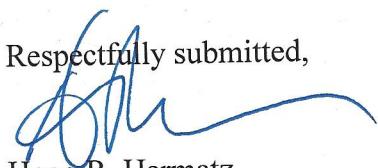
In the interest of judicial economy, administration, and justice; to avoid a disregard of judicial resources; as well as avoiding what would amount to a duplication of the 21 November 2018 Opposition as filed by counsel for Chu to plaintiffs’ motion, defendants Stepien and Cardona, by way of this letter, join and support said Opposition.

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With the above being said, it is highly suspect that plaintiffs could honestly seek relief against Cardona and Stepien whereas plaintiffs' attorney has already stated numerous times that he only named Cardona and Stepien to the litigation to, in sum, climb the food chain to find out who was involved in what amounts to empty claims. Moreover, plaintiffs' attorney and said attorney's investigator and navy seal pal have already acknowledged that Warren Earnst (*an individual who is not a named party to the litigation, but yet was graciously included in the plaintiffs' 13 November 2018 Certification of Timothy C. Parlatore, Esquire*), was "not the type of guy" to become associated with any harassment or intimidation of persons.

What is evidently clear is the plaintiffs' motion for reconsideration is not only untimely; deficient; does not meet the standard for reconsideration; devoid of facts, legal basis, or case law; (*See Opposition filed 21 November 2018 by counsel for Chu and Newton*), but was purely filed by plaintiffs' counsel to intentionally harass the defendants; increase litigation costs of the defendants; and cloud the imprudent actions of the plaintiff. In light of same, and for the reasons previously submitted to the Honorable Court via "Defendants' October 24 2018 Memorandum of Law in Opposition to the Motion for a Preliminary Injunction, as well as defendants Chu and Newton's 21 November 2018 submissions, the renewed motion should be denied by the Honorable Court.

Respectfully submitted,



Hugo R. Harmatz

HRH: file- CARDONA/STEPIEN/ALPHA/FED/CT/LGL/COMM/18